
MIOSHA

AGENCY INSTRUCTION

Michigan Occupational Safety and Health Administration
Michigan Department of Labor and Economic Growth

DOCUMENT IDENTIFIER:
ADM 04-1

DATE:
May 14, 2004

SUBJECT: MIOSHA Partnerships for Worker Safety and Health

ABSTRACT

- I. Purpose:** This instruction establishes agency policy for the development, approval, and implementation of MIOSHA Partnerships for Worker Safety and Health.
- II. Scope:** This instruction applies agency-wide.
- III. References:** Federal OSHA Instruction TED 8-0.2.
- IV. Distribution:** General; Internet Access.
- V. Cancellations:** None.
- VI. Originator:**

Douglas J. Kalinowski, Director
Michigan Occupational Safety and Health Administration

- I. Purpose. This instruction establishes agency policy for the development, approval, and implementation of MIOSHA Partnerships for Worker Safety and Health. Over the past several years, MIOSHA has entered into a variety of cooperative agreements to carry out its mission to protect the safety and health of Michigan workers. These partnerships have shown the value of increasing the cooperative activities of the agency. These partnerships have also revealed a desire for greater consistency and formalization so that agency-wide needs and objectives may be met. This instruction describes and implements agency policy for development of MIOSHA Partnerships for Worker Safety and Health. In general, partnerships are voluntary, cooperative relationships between MIOSHA and others. Partnerships can be developed with an individual employer, employees, and/or their representatives. Partnerships can also be developed with a group of employers, employees and/or their representatives. In addition to the employer(s) and their employees/representatives, a partnership may also include other stakeholders as appropriate. Partnerships aim to achieve a significant and measurable reduction in workplace deaths, injuries, and illnesses. This instruction sets forth principles and procedures for development, approval, implementation, and evaluation of these programs. See Appendix A for “Frequently Asked Questions and Answers” related to MIOSHA Partnerships for Worker Safety and Health.
- II. Scope. This instruction applies agency-wide.
- III. References. Federal OSHA Instruction TED 8-0.2
- IV. Definitions:

MIOSHA COMPREHENSIVE PARTNERSHIP: A partnership that contains all core elements detailed in this instruction. The Comprehensive Partnership agreement must include the participating employer’s commitment to implement in a timely manner an effective workplace safety and health management system that provides for management leadership, employee involvement, worksite analysis, hazard prevention and control, safety and health training, and compliance with applicable MIOASH Act requirements.

MIOSHA INCENTIVE: An alternative approach to traditional enforcement or provision of consultation education and training services included in a MIOSHA comprehensive or limited partnership. Alternative approaches may include focused inspection, development and use of protocols to guide inspection activity, outreach information and assistance during initial implementation phase of the partnership, priority consideration for CET services, or other innovations as identified.

MIOSHA LEVERAGING: A technique to increase the impact of the agency’s activities on workplace safety and health without the need for MIOSHA to devote significant additional resources. The increased impact may involve reaching a greater number of employers and/or employees or achieving increased worker protection sooner than by other means. Whatever strategies are used, the ultimate goal of all leveraging activities must be a reduction in job-related

deaths, injuries, and illnesses. To the extent possible, partners are expected to participate in leveraging by, among other actions, sharing their experiences and successes with others.

MIOSHA LIMITED PARTNERSHIP: A partnership that includes some, but not all core elements included in this instruction. For example, a Limited Partnership, rather than requiring establishment of a comprehensive safety and health management system, might focus on eliminating a prevalent hazard in a particular industry. All Limited Partnerships must contain the core element of MIOSHA Inspections and must follow the Proposal, Review and Approval process and Information Collection and Dissemination.

MIOSHA PARTNERSHIPS FOR WORKER SAFETY AND HEALTH. This term denotes a MIOSHA strategy, available to all industries, whereby MIOSHA enters into an extended, voluntary, cooperative relationship with others. Partnerships can be developed with an individual employer, employees, and/or their representatives. Partnerships can also be developed with a group of employers, employees and/or their representatives. In addition to the employer(s) and their employees/representatives, a partnership may also include other stakeholders as appropriate. A partnership will encourage, assist, and recognize their efforts to eliminate serious hazards and achieve a high level of worker safety and health. A MIOSHA Partnership aims to have a measurable, positive impact on workplace safety and health that goes beyond what historically has been achievable through traditional enforcement methods and through a focus on individual worksites.

- V. Originator: The originator of this document is Douglas J. Kalinowski, Director, Michigan Occupational Safety and Health Administration.
- VI. Background: Over the past several years, MIOSHA has entered into a number of agreements with organizations and employers. These efforts have been designed to increase MIOSHA's impact on worker safety and health, and at the same time, help MIOSHA expand the options for working with employers by providing employers with the option of a partnership. Employer groups, labor organizations, individual employers, and employees and their representatives committed to developing and implementing a strong and effective safety and health management system will find MIOSHA a willing partner.
- VII. Core Elements: The following core elements must be addressed in all Comprehensive MIOSHA Partnerships. Limited MIOSHA Partnerships are required to address only the element of MIOSHA Inspections. However, developers of Limited Partnerships are urged to use the core elements as a major source of guidance and to incorporate as many as appropriate.
 - A. Situation Analysis.

This core element is the analysis that determines if a particular situation lends itself to the partnership approach. Examples of possible reasons for developing a partnership include:

1. Expanding MIOSHA's reach to industries and workplaces where no intervention models presently exist, or where current intervention methods could be strengthened.
2. Providing the agency with a means to address emerging issues.
3. Experimenting with abatement technologies that may prove to be as effective or more effective than traditional methods.
4. Enabling MIOSHA to increase its emphasis on known or traditional hazards.

B. Identification of Partners.

Priority for partnerships will be given to those programs that support MIOSHA's Strategic Plan and make the best use of agency resources. Partnerships can be developed with an individual employer, employees, and/or their representatives. Partnerships can also be developed with a group of employers, employees and/or their representatives. In addition to the employer(s) and their employees/representatives, a partnership may also include other stakeholders as appropriate. These partnerships shall be in high-hazard workplaces or in workplaces with prevalent types of injuries and illnesses. MIOSHA may also partner with low-hazard establishments if the agency finds it will have a significant impact on the reduction of injuries and illnesses.

C. Partnership Goal.

A clearly defined goal statement that identifies the safety and health issues the partnership is intended to address, expected impact, measures to gauge success, time frames including a "sunset clause" completion date (which can be extended after careful evaluation), and MIOSHA's resource needs. Comprehensive Partnerships must contain goals for employers, employees, and/or employee representatives that are clearly articulated, measurable, and verifiable.

D. Measurement System.

Comprehensive Partnerships must contain a results-focused measurement system, developed at the outset of the partnership. The measurement system must:

1. Use activity, intermediate, and outcome measures (including measures to address the effectiveness of leveraging).
2. Identify baseline data corresponding to all summary line items on the MIOSHA 300 Log.

Also, the measurement system may include such measures as changes in exposure levels, the experience modification rate, and comparisons of pre- and post-intervention scores

obtained using appropriate tools, e.g., the Safety and Health Assessment Worksheet (CET Form 33).

E. Safety and Health Management System.

Effective workplace safety and health management systems are self-sustaining and encompass six main areas: management commitment/leadership; employee involvement; worksite analysis; hazard prevention and control; safety and health training; and compliance with applicable MIOASH Act requirements.

Employers participating in Comprehensive Partnerships must have in place an effective site-based safety and health management system. These systems should be based on MIOASHA's Safety and Health management system guidelines whenever feasible. Alternative safety and health management systems that differ significantly will be carefully considered.

A Limited Partnership, e.g., one focused on a specific hazard, may find it feasible and appropriate to either require or encourage employers to implement an effective safety and health management system.

One of the tools available to help determine a program's effectiveness is the MIOASHA Safety and Health Management System Assessment Worksheet (CET Form 33).

F. Employee Involvement and Employee Rights.

1. Employees bring valuable skills and perspectives to the development stage of a Partnership and participation is essential. Employee involvement in the day-to-day implementation of worksite safety and health management systems and other Comprehensive Partnership activities is required.
2. All affected unions must be supportive of a Comprehensive or Limited Partnership to move forward. Labor organizations must be signatories to the partnership agreement or, alternatively, must indicate in writing their willingness for the partnership to proceed but waive their opportunity to be a signatory.

For a non-union worksite, involving employees at the outset in the development of the partnership is strongly encouraged, if feasible. It is highly desirable that there be evidence of employee involvement in and commitment to the partnership.

3. Partnering employers must commit to incorporating high levels of employee involvement in their safety and health management system if such an element does not already exist.
4. Examples of employee involvement include, but are not limited to:

- a) Participating on safety and health committees, joint labor-management committees, and other advisory or specific purpose committees, if otherwise lawful and appropriate;
- b) Conducting site inspections, safety and health audits, job hazard analyses, and other types of hazard identification;
- c) Developing and using a system for reporting hazards;
- d) Developing and revising the site's safety and health rules and safe work practices;
- e) Participating on workplace teams charged with identifying root causes of accidents, incidents, or breakdowns;
- f) Implementing controls to eliminate or reduce hazard exposure;
- g) Collecting samples for monitoring;
- h) Making presentations at safety and health meetings;
- i) Delivering training to current and newly hired employees; and
- j) Participating in safety and health management system reviews.

G. Stakeholder Involvement: Partnerships are expected to involve those stakeholders whose input and participation are important to the success of the partnership, as appropriate.

H. MIOSHA Incentive.

1. All Comprehensive Partnerships must include a MIOSHA incentive.
2. A Limited Partnership may include incentives, if determined appropriate by MIOSHA.
3. Incentives included in partnerships must be commensurate with the participating employer's efforts to provide safe and healthful working conditions and the degree of success achieved. Further, incentives must be consistent with MIOSHA incentives contained in other agency programs, policies, and procedures. Following are examples of MIOSHA incentives that may be included in a partnership:
 - a) Outreach information and assistance during the initial implementation phase of the partnership.
 - b) Priority consideration for CET consultative services provided by on-site or traditional consultation services.
 - c) Programmed inspections that focus on the most serious hazards prevailing at the partnering workplaces.
 - d) For any cited hazards, penalty reductions calculated in accordance with agency procedures in the Field Operations Manual (FOM) that provide good-faith reductions for effective safety and health management systems.
 - e) Identification of strategies to be used by the parties to provide positive publicity about the partnership and the partnering establishments, and the resulting benefits.

- I. Verification. Partnerships must include provisions to verify that the employer is upholding their responsibilities under the partnership.
 1. Verification may be achieved by developing and implementing verification procedures or protocols. Protocols must include the following:
 - a) The number or percentage of sites to receive verification inspections.
 - b) The scope of the verification inspections.
 - c) Assurance that citations will be issued and penalties assessed for violations of standards, regulations, or the general duty clause found during verification inspections. An employer's safety and health management system will not in itself be basis for citation except where required by a specific standard.
 - d) The manner in which employees and/or employee representatives will be involved in verification inspections. At a minimum, the verification protocols must afford employees all statutory rights pertaining to participation in inspections.
 2. Other approaches may be developed as appropriate to the scope of the partnership and/or industry. For example, a construction partnership might include focused planned inspections reviewing the four leading causes of fatalities.
 3. Partners may use internal resources or private consultants to conduct worksite assessments. However, this does not take the place of required MIOSHA verification inspections.
- J. MIOSHA Inspections. All partnership agreements must state that partnering employers remain subject to MIOSHA inspections and investigations in accordance with established agency procedures.
 1. It will not be necessary to conduct a programmed inspection of a partnering employer if the agency has conducted a verification inspection in accordance with the approved protocols of the partnership within the last 12 months.
 2. If a partnering employer is targeted for a programmed inspection, the inspection will be conducted following the approach identified in the verification procedure.
 3. If a partnering employer appears on a special or local emphasis program list, the inspection will focus on the hazards identified as targets of the program. It is anticipated that, in most instances, the hazards that are the focus of the special or local emphasis program will parallel or closely relate to the hazards identified as most serious by the partnership.
- K. Program Evaluation. All Comprehensive Partnerships must include a process for evaluation (normally at one-year step interval) to determine if the program needs to be modified or discontinued or has potential for expansion. This evaluation will make use

of data obtained by the partnership's required measurement system (VII.D). See Appendix C for a sample evaluation format. This format may be modified if necessary to address the goals of a specific partnership.

- L. Leveraging. In the interest of conserving MIOSHA resources, Comprehensive Partnerships must contain a leveraging component, to be determined after an analysis of possible leveraging opportunities.
- M. Termination. The documentation for all Comprehensive Partnerships must contain language that specifies the conditions under which the program will be terminated. Examples include: "sunset" provisions; termination if any of the primary parties (MIOSHA, employers, employees and/or their representatives) unilaterally withdraws from the Partnership; or termination when the goals of the program have been met. Withdrawal of one of the primary parties from the agreement must result in termination of the partnership agreement.

VIII. Additional Recommendations: The following issues should be considered in the development of partnerships, but are not required core elements:

- A. Priority should be given to partnership proposals that support the agency's Strategic Plan.
- B. Employer inspection history and relationship with MIOSHA should be reviewed and considered.
- C. Partnerships may require employers to post results of self-inspections and other documents, and may require employers to make reports to MIOSHA of their activities under the partnership.
- D. Although Comprehensive and Limited Partnerships must be described in a written agreement between MIOSHA and its partners, the particular structure and degree of formality of the partnership will be determined on a case-by-case basis.

IX. Partnership Proposal, Review, and Approval. All Comprehensive and Limited Partnerships must follow the process below:

- A. Partnership Proposal. All proposals for comprehensive or limited partnerships must be submitted to MIOSHA Administration. A proposal must contain an itemized description of how the program addresses the core elements. For Comprehensive Partnerships, all core elements must be addressed. Limited Partnerships must include the element of MIOSHA inspections plus other core elements as appropriate. In addressing the core elements, the proposal must provide:
 - 1. Overview. A general statement of the safety and health problem that the partnership intends to address, including consideration of the appropriateness of this particular approach and a description of the verification protocols to be used.

2. Identification of Partners. Complete identification of all parties who will be signatory to the agreement. All local and international unions that have been involved in early discussions and the development of the program should be identified, with specific individuals and their positions named.
3. Goal. A clearly defined statement of the partnership's goals, as appropriate, indicating how partnering with these parties will support MIOSHA's Strategic Plan.
4. Data Collection/Analysis. Information on what data will be collected, time frames, who will be responsible for data collection and analysis, and how the program's measurement system is designed to measure results.
5. Safety and Health Management System. A commitment to maintain an effective safety and health management system at all worksites included in the partnership. Information on whether a comprehensive and fully implemented safety and health management system exists and what steps will be taken to promote its establishment, improvement, and continuing effectiveness. Indicate if the MIOSHA Safety and Health Program Guidelines will be used as the basis for these worksite programs. If an alternative is being proposed, provide details and justification for the adoption of this alternative.
6. Employee Involvement. Describe how the partnership will ensure meaningful employee involvement. The proposal should indicate the role of labor organizations, when applicable.
7. Stakeholder Involvement. Describe what efforts are being made to involve other appropriate stakeholders and what roles these stakeholders have agreed to.
8. MIOSHA Incentives. Describe the kinds of assistance, recognition, or other incentives MIOSHA can offer the partnership. What forms of technical assistance will be provided and who will provide these services. Include a thorough description of any plans to use partnership participants or private consultants to conduct worksite assessments. These assessments will not take the place of required MIOSHA verification.
9. Onsite Verification. Details of a plan for MIOSHA to verify, through onsite inspection, that partnering employers in a Comprehensive Partnership are meeting their obligation to provide safe and healthful working environments. This shall include their commitment to develop and operate an effective worksite safety and health management system and their compliance with MIOSHA regulations.
10. MIOSHA Inspections. All partnerships must stipulate that partnering employers remain subject to MIOSHA inspections and investigations in accordance with established agency procedures.

11. Partnership Evaluation. A description of the process for periodic (generally annual) evaluation of the overall partnership.
12. Leveraging Strategy. A discussion of the partnership leveraging, e.g., ways in which the partnership expects to maximize, either immediately or in the long run, the return on MIOSHA's investment of resources.
13. Termination. Specification of the circumstances that will trigger termination of the partnership. Include proposed term of the partnership (e.g., 3 years) and the conditions for its premature termination.

B. Review and Approval.

1. All partnership proposals must be reviewed and formally approved by the agency.

Input from the appropriate enforcement division and the consultation division will be obtained prior to determining whether the proposed partnership should be approved.

2. If a proposal is not approved, notification will be provided to the originators of the proposal and will include the reasons for declining the proposal and providing an opportunity to submit a modified proposal.
3. A lead division will be identified to provide oversight for each partnership. The lead division has responsibility for working with the partner and coordinating partnership activities and ensuring necessary follow-up and evaluation. Other MIOSHA divisions may be involved with specified partnership activities or initiatives.

X. Information Collection and Dissemination

- A. MIOSHA intends to collect and disseminate information on the results of the MIOSHA Partnership Program. It is expected this information will help identify useful ideas for circulation and broader implementation. The information will also play a vital role in the agency's commitment to recognize, publicize, and promote successful partnerships with the agency.
- B. A file will be established and maintained for each partnership. The information required to be in the file include the initial proposal, any implementing instructions, other documents subsequently developed, and any important information not in the original proposal, e.g., involvement of new stakeholders, data collected through the program's measurement system, data analyses, information on training and other outreach activities, success stories, and program evaluation reports.
- C. A central file for partnership agreements will be maintained by the MIOSHA Administration Division. This file will contain all of the following:

1. A copy of the initial proposal.
 2. A copy of the notification of proposal approval on declining of proposal.
 3. A copy of subsequent annual evaluations.
- D. The lead division for a newly approved partnership will coordinate with the MIOSHA Communications Specialist to ensure appropriate media releases and notifications are prepared and issued and that arrangements for any related events are completed.
- E. The lead division will provide information on success stories and other significant achievements to the MIOSHA Communications Specialist to coordinate dissemination of information.

APPENDIX A

FREQUENTLY ASKED QUESTIONS AND ANSWERS

MIOSHA PARTNERSHIPS FOR WORKER SAFETY AND HEALTH

1. Q: What are MIOSHA Partnerships for Worker Safety and Health?
A: MIOSHA Partnerships for Worker Safety and Health are programs in which the agency enters into cooperative relationships with an individual employer, employees, and/or their representatives. Partnerships can also be developed with a group of employers, employees and/or their representatives in order to encourage, assist, and recognize their voluntary efforts to focus on and eliminate serious hazards and achieve a high level of safety and health. In addition to the employer(s) and their employees/representatives, a partnership may also include other stakeholders as appropriate. MIOSHA Partnerships are characterized by core elements that may not be present in other MIOSHA activities (see Appendix B). Partnerships are divided into two subclassifications: Comprehensive and Limited. The goal of all partnerships is a significant and measurable reduction in workplace deaths, injuries, and illnesses.
2. Q: Can MIOSHA offer focused inspections as incentives to MIOSHA Partnerships?
A: Yes, so long as the partnership has carefully identified the most serious hazards prevailing at partnering worksites.
3. Q: Can MIOSHA offer penalty reductions greater than the reductions that the present system provides, as an additional inducement for employers to partner with MIOSHA?
A: No. Current procedures already provide for substantial good-faith reductions for employers who implement effective safety and health management systems.
4. Q: What is the role of workers in a Comprehensive MIOSHA Partnership?
A: All Comprehensive Partnerships must have a high level of employee involvement from the outset. At non-union workplaces, it is not expected that employees will sign the partnership agreement, but evidence of their involvement and commitment is highly desirable. MIOSHA expects workers to be involved in the development and operation of the partnership as well as the individual site's safety and health management system.
5. Q: Do MIOSHA Partnership programs have to be written agreements between MIOSHA, the workers or their representative, and the employers?
A: Yes. Both Comprehensive and Limited Partnerships must have a written agreement. The written agreement must spell out the goals and objectives and address the other core elements of the partnership so that all parties understand what is expected.
6. Q: Must an employer have an effective safety and health management system already in place before it can propose a Comprehensive MIOSHA Partnership?
A: No. MIOSHA can enter into a Comprehensive Partnership when it has some reasonable assurances that participating employers will develop and implement effective safety and

health management systems in the near future. A partnership may have as one of its primary goals the timely development and implementation of workplace safety and health management systems.

7. Q: When a partnership includes a commitment that an employer will implement an effective safety and health management system, is there a time limit for employer implementation?
A: Yes. A timetable for implementation will be agreed upon by the partners and included in the partnership agreement. Review of implementation will be part of the partnership evaluation and may include the timetable recommendations for modifying the original implementation timetable.
8. Q: How does MIOSHA define an “effective” safety and health management system?
A: As a general rule, an effective safety and health management system should conform to MIOSHA’s safety and health management system guidelines. MIOSHA recognizes that there may be situations, however, where a safety and health management system not based on the guidelines would be appropriate for a particular MIOSHA Partnership. Such an alternative program must be fully described in the proposal and, at a minimum, must include the six main elements addressed by the guidelines and common to all comprehensive, effective safety and health management systems. These are management commitment/leadership, employee involvement, worksite analysis, hazard prevention and control, safety and health training, and compliance with applicable MIOASH Act requirements. Moreover, effective safety and health management systems are self-sustaining systems that become fully integrated into the day-to-day operations of a workplace.
9. Q: Why is MIOSHA willing to consider, on a case-by-case basis, the establishment of partnership programs with employers that have a history of serious safety and health hazards and violations?
A: MIOSHA does not want to close the door on using the partnership approach to encourage the efforts of employers who are committed to improving the health and safety of their workers.
10. Q: Is there a requirement that agency stakeholders be involved in developing a MIOSHA Partnership program?
A: There is no hard and fast rule about stakeholder involvement because each situation will be different. It is up to the proposal originators and MIOSHA staff to identify and involve those stakeholders whose participation is needed to make the program successful, recognizing that local and national level stakeholders may not always agree.
11. Q: Can the agency modify its traditional enforcement by offering a programmed inspection exemption to employers as an incentive for participation in a MIOSHA Partnership?
A: No. The agency allows exemptions from routine inspections only for MVPP and MSHARP participants. An exemption would also be allowed on open cases with the CET On-Site Consultation Program.

12. Q: Can the agency still conduct unprogrammed inspections of partnering employers?
A: Yes. MIOSHA will conduct complaint inspections, accident inspections, etc., in accordance with established agency policy.
13. Q: Can the agency provide onsite technical assistance in identifying and correcting hazards to employers who participate in a MIOSHA Partnership Program?
A: Yes. MIOSHA'S CET Division traditionally uses onsite consultation services that are available to provide training, consultation and/or technical assistance as appropriate. Alternatively, the partnership employer(s) may employ private consultants to provide onsite technical assistance.
14. Q: How does the policy contained in this instruction affect special or local emphasis programs and other program inspection plans?
A: If a partnering employer appears on a special or local emphasis program list, the inspection will focus on the hazards identified as the targets of partnership effort. It is anticipated that, in most instances, the hazards that are the focus of an emphasis program will parallel or closely relate to the hazards identified as most serious by the partnership.
- A programmed inspection will be conducted when a partnering employer targeted for inspection under a programmed inspection plan in accordance with established agency procedures.
15. Q. What are the primary differences between Alliances and Partnerships with MIOSHA?
- Both Alliances and Partnerships provide opportunities to establish formal, ongoing relationships with the MIOSHA program. The Alliance program focuses on opportunities to establish relationships that will help promote, educate, and provide outreach on safety and health issues. These relationships are with organizations, associations, and other groups. A Partnership, in contrast, is generally with a specific employer or group of employers and their employees. The focus of a Partnership is to achieve a high level of worker safety and health at the partnering employer's or group of employer's facilities.

APPENDIX B

SUMMARY OF CORE ELEMENTS MIOSHA PARTNERSHIPS For WORKER SAFETY AND HEALTH	
SITUATION ANALYSIS	<ul style="list-style-type: none"> Analyze each situation to determine if Partnership is an appropriate approach.
IDENTIFICATION OF PARTNERS	<ul style="list-style-type: none"> Give priority to partnerships that support MIOSHA's Strategic Plan and make the most effective use of MIOSHA resources. The primary partners in a MIOSHA Partnership normally will be with an individual employer, employees, and/or their representatives. Partnerships can also be developed with a group of employers, employees and/or their representatives. In addition to the employer(s) and their employees/representatives, a partnership may also include other stakeholders as appropriate. MIOSHA partnerships normally should involve employers and employees and their representatives in high-hazard workplaces or other workplaces with prevalent types of injuries/illnesses. MIOSHA may encourage partners, or partners may proactively seek a partnership with MIOSHA.
GOAL	<ul style="list-style-type: none"> A clearly defined goal statement identifies the issues, expected program impact, measures to gauge success time frames, and MIOSHA resource needs.
LEVERAGING	<ul style="list-style-type: none"> Leveraging enables a Partnership to maximize the return on MIOSHA's commitment of resources. During initial stages, MIOSHA may need to expand its commitment of time and resources. Increasing impact while limiting agency resource expenditures is long-term goal of partnership leveraging.
SAFETY AND HEALTH MANAGEMENT SYSTEMS	<ul style="list-style-type: none"> Employer partners in Comprehensive partnerships must have/agree to have an effective, comprehensive safety and health management system. Limited partnerships may require comprehensive safety and health management systems.
EMPLOYEE INVOLVEMENT/RIGHTS	<ul style="list-style-type: none"> Employee involvement in the initial formulation of a partnership agreement is required. At unionized sites, the exclusive representative(s) must be involved as early as possible in the development and implementation of a Comprehensive or Limited partnership. When safety and health management systems are required by a partnership, employers must demonstrate a high level of employee involvement in their worksite programs. Partnerships must explicitly safeguard employees' exercise of their rights under the MIOSHA Act and MIOSHA regulations and policy.

STAKEHOLDER INVOLVEMENT	<ul style="list-style-type: none"> Partnerships should involve all appropriate stakeholders whose input and participation are important to the programs success.
MEASUREMENT SYSTEM	<ul style="list-style-type: none"> Comprehensive Partnerships must have a results-focused measurement system, developed at the program's outset. The measurement system must include activity intermediate, and outcome measures.
MIOSHA INCENTIVES	<ul style="list-style-type: none"> Partnership incentives must correspond to the participating employer's level of effort and success in providing safe and healthful working conditions. Partnership incentives must be consistent with those offered in other agency programs, policies and procedures. Possible incentives include: <ul style="list-style-type: none"> ◆ Outreach, assistance and training ◆ Priority for CET services ◆ Programmed inspections that focus on the site's most serious hazards. ◆ Penalty reductions for any cited hazard calculated in accordance with general agency procedures. ◆ Agreement to provide positive publicity. A MIOSHA lead division will be identified to be involved in Partnership development. MIOSHA should provide appropriate technical assistance. The Partnership may choose to employ private consultants to provide technical assistance.
VERIFICATION	<ul style="list-style-type: none"> In Comprehensive Partnerships, verification inspections conducted by MIOSHA are required of a percentage or number of partnering employers, or worksites. Protocols must afford employees all statutory rights pertaining to participation in inspections.
MIOSHA INSPECTIONS	<ul style="list-style-type: none"> In all partnerships, partnering employers remain subject to programmed and unprogrammed inspections. Partnerships may offer focused inspections. This incentive may affect the scope of certain programmed inspections. A programmed inspection will be unnecessary if MIOSHA has conducted a verification inspection in accordance with the approved partnership protocols within the last 12 months.
EVALUATION	<ul style="list-style-type: none"> All Comprehensive Partnerships must be evaluated, normally at one-year intervals.
TERMINATION	<ul style="list-style-type: none"> Language is required specifying the proposed term of a Comprehensive Partnership and the circumstances that will trigger a premature termination.

APPENDIX C

MIOSHA PARTNERSHIP ANNUAL EVALUATION FORMAT

Name and Address of Partnership:

Lead MIOSHA Division:

Name of Evaluator

Evaluation Period [e.g., May 1, 2004 to April 30, 2005]

MIOSHA-300 Log Rates (TCIR and DART) - averages for all Partnership worksites included in the evaluation.

Other Partnership measurement data

Analysis/explanation of changes in rates and other data

Impact of Partnership: Describe the impact of the partnership in terms of improvements to baseline measures, number of sites and employees affected, and other successes, e.g., training conducted. Cite concrete results, including improvements in injury and illness and lost workday average rates for the partnership and any other data measurements being collected by the partnership.

Significant changes in the Partnership over the past year [e.g., additional partners, new stakeholder involvement, new activities begun during evaluation period].

Partnership challenges/concerns

Plans to improve Partnership

Recommendation: Should Partnership be continued or terminated?